

CHESSIE THACHER (SBN 296767)
cthacher@aclunc.org
ANGELICA SALCEDA (SBN 296152)
asalceda@aclunc.org
SHAILA NATHU (SBN 314203)
snathu@aclunc.org
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF NORTHERN
CALIFORNIA, INC.
39 Drumm Street
San Francisco, CA 94111
Telephone: (415) 621-2493

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

PACIFIC MEDIA WORKERS GUILD; ANGEL
JOSE FLORES; JULISSA RUIZ RAMIREZ;
ALYSSA LEIVA;

Plaintiffs,

vs.

CITY OF MODESTO, BRANDON
GILLESPIE, in his official capacity as Modesto
Chief of Police,

Defendants.

CASE NO. 2:26-CV-01623-JAM-CKD

**DECLARATION OF F.B. IN
SUPPORT OF MOTION TO
PROCEED PSEUDONYMOUSLY**

Judge: Hon. John A. Mendez
Courtroom: 6, 14th Floor
Date: June 30, 2026
Time: 1:00 p.m.

1 I, F.B., declare:

2 1. I have personal knowledge of the facts set forth in this declaration, and if called to
3 testify as a witness thereto, could do so competently under oath.

4 2. I am originally from Saudi Arabia, but I now live in Modesto and the greater Bay
5 Area. In or around 2011, I came to the United States as a student to study at an American
6 university.

7 3. In 2015, Mohammed Bin Salman began to come to power in Saudi Arabia. He
8 quickly began consolidating control of Saudi Arabia. His government started cracking down on
9 political dissidents, detaining and incarcerating people who had spoken out for human rights.
10 When I visited Saudi Arabia in 2015, the country was very different, with large posters of
11 Mohammed Bin Salman that told people to “Obey” in Arabic.

12 4. In 2016, after Mohammed Bin Salman came to power, I applied for asylum in the
13 United States due to my fears of being persecuted by the government of Saudi Arabia for my
14 atheism, support of LGBTQ rights, and my political activism. Since then, I have lived in the
15 greater Bay Area, including Modesto and Turlock.

16 5. From my experiences in Saudi Arabia, I feel strongly about free speech and the
17 importance of protesting. I feel that speaking out is the only way to diminish the threat of
18 repression. I also feel strongly about Palestine and imperialism, believing there are active links
19 between the plight of Palestine, the U.S. government, and the U.S. support for the Saudi regime,
20 particularly the Al-Saud family. I often attend protests for Palestinian liberation, for democracy
21 in the U.S. (such as the “No Kings” protests), and against police violence.

22 6. I regularly go to protests in Modesto. At protests, I often wear a gaiter-style mask
23 or a keffiyeh to protect my identity and safety. When I wear a keffiyeh over my face, I feel and
24 look like a Palestinian activist, protesting for freedom. I especially cover my face with a gaiter or
25 keffiyeh during tense protests, such as when there are people present who I recognize as right-
26 wing agitators or who might be trying to doxx me. Wearing a keffiyeh over my face therefore
27 represents both my political beliefs and my need for anonymity.

1 7. Because I am seeking asylum, I feel the need to protect my identity when
2 protesting, even though I do so peacefully and obey police orders. I am afraid that officials in the
3 U.S. and also in Saudi Arabia might retaliate against me for exercising my free speech rights. I
4 am especially afraid of getting punished for speaking out about the Palestinian genocide given
5 what has happened to other immigrants expressing pro-Palestinian views in the U.S. I am
6 thinking, for example, of people like Mahmoud Khalil and Rumeysa Ozturk, two foreign-born
7 U.S. students that American officials detained for months simply because they publicly and
8 peacefully expressed support for Palestine.

9 8. At the June 14, 2025 ICE Out protest in Modesto, I wore a ski mask that partially
10 covered my face. At that protest, I witnessed Modesto Police Department (“MPD”) officers
11 arrest another protester for wearing a mask. I watched as the officers, who were wearing helmets
12 and who were armed with long guns, brought the protester to an unmarked vehicle. At the time, I
13 had no idea why the protester was being arrested. That day, MPD arrested several other
14 protesters who did not seem to be doing anything wrong, but who were wearing masks as well.

15 9. After the first arrest, other protesters began texting me, concerned that I could
16 also get arrested. They knew that I am seeking asylum and were worried that I would get
17 arrested. I was concerned and stunned by what was happening.

18 10. Modesto’s Protest Restrictions Ordinance (“Ordinance”), which prohibits a
19 protester from wearing a mask or scarf over a part of their face at protests, confuses and frightens
20 me. I do not understand why I should be prohibited from wearing a keffiyeh scarf over my face
21 to express a message of solidarity with Palestine. I find the threat of arrest for doing this really
22 worrying. While I am against the U.S. Government and its actions in the Middle East, I am
23 deeply appreciative of the right to protest in this country and do not want to stop protesting. I
24 think that the only thing that can preserve the right to protest is protesting.

25 11. The Ordinance puts me in a double bind. On one hand, I cannot wear a keffiyeh or
26 gaiter-style mask to protect my identity at protests or I will be arrested, but then if I am arrested,
27 I might face deportation to Saudi Arabia. And, on the other hand, if I do go to protests without
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1 covering my face, I risk being identified, doxxed, and retaliated against for supporting Palestine.
2 As I noted, other pro-Palestine protesters who are immigrants like me have been detained and
3 threatened with deportation by the Trump administration for their pro-Palestine activism after
4 they were doxed by pro-Israel groups. I am scared that the same thing could happen to me. I am
5 even more vulnerable than Mahmoud Khalil, who has a green card but is still facing deportation.

6 12. If I was deported to Saudi Arabia, I fear that I would face persecution for my pro-
7 democracy activism. These fears have only increased since Mohammed Bin Salman came to
8 power, because he has cracked down on dissidents, the press, and any attempts to bring
9 democracy to Saudi Arabia. Many pro-democracy activists that I knew and collaborated with in
10 Saudi Arabia are now in prison there.

11 13. I believe that I should be able to protest peacefully and speak out publicly in the
12 U.S., but in the current moment it is not safe for me to do so. The Trump administration's
13 repression puts me in danger, but I still feel I must speak out. I have two young sons who were
14 born in the United States. This is their country. They will grow up here. I feel the need to speak
15 out for them, so that they can grow up in a country with equality and civil rights.

16 14. I am providing this declaration with only my initials for the same reason I want to
17 continue wearing my keffiyeh or another mask at protests. I worry that if I am identified as
18 someone who attends protests with certain messages, including pro-Palestinian protests, I could
19 be retaliated against by the federal government by detained and deported. I know, for example,
20 that the federal government is retaliating against other pro-Palestine supporters who are not
21 citizens, and that they have threatened to continue deporting immigrants who speak out in
22 support of Palestine.

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1 15. I worry that if I submit this declaration under my true name, I may face retaliation
2 and deportation, which is a risk I am not aware of any other plaintiff or witness being subject to.
3 Although protesters face many forms of retaliation, I am particularly afraid because, as an
4 asylum-seeker, I am vulnerable to detention and deportation if the government learns my
5 identity.

6 16. I declare under penalty of perjury that the foregoing is true and correct, and
7 that this declaration was executed at Modesto, California this 1st day of May 2026.

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